

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI**

AFFIDAVIT

I, Matthew Smith, being first duly sworn, do hereby depose and state that:

1. I am a Task Force Officer (TFO) with United States Immigration and Customs Enforcement (ICE) Office of Homeland Security Investigations (HSI). I have been a sworn law enforcement officer since 2001 and have been employed by the Jasper County Sheriff's Office, Carthage, Missouri, since October 2006. I am currently assigned to the Southwest Missouri Cyber Crimes Task Force (SWCCTF).
2. I have received training in the area of child exploitation and child pornography investigations, enticement, inducement of minors and have had the opportunity to observe and review numerous examples of child pornography in all forms of media, including computer media.
3. As part of my duties as a TFO, I investigate criminal violations relating to child exploitation, child pornography, human trafficking, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2422(a) and (b), 2252(a), and 2252A.
4. The statements in this affidavit are based on personal observations, training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a complaint and an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth the facts necessary to establish probable cause to believe that KALEB WILSON has violated Title 18, United States Code, Sections 2252(a)(2), that is, receipt and distribution of child pornography.

STATUTORY AUTHORITY

5. 18 U.S.C. § 2252 prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, or possessing any visual depiction of minors engaging in sexually explicit conduct when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce.

DEFINITIONS

6. The following definitions apply to this Affidavit:
 - a. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.
 - b. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (ii) bestiality; (iii) masturbation; (iv) sadistic or masochistic abuse; or (v) lascivious exhibition of the genitals or pubic areas of any person.

PROBABLE CAUSE

7. On Friday, May 5, 2017, Instagram submitted CyberTipline Report 20480088 (CTR) to the National Center for Missing and Exploited Children (NCMEC). The CTR indicated that an Instagram user, identified with the e-mail address “kaleb_88_311@hotmail.com,” uploaded multiple images depicting child pornography to Instagram. The images uploaded by the suspect user were included in the CTR submission. The CTR was then forwarded to the Southwest Missouri Cyber Crimes Task Force for investigation.

8. On August 22, 2017, I reviewed the images submitted with the CTR. One such image depicted the lower torso of a child lying her stomach. The focal point of the image is the child's buttocks. The image captured the child's genital area.
9. The CTR indicated that the images were uploaded between March 21, and March 26, 2017. The CTR also identified the IP address used to post the images as 2602:306:c5f1:4560:fd8b:8a3a:99ec:48cc.
10. On Friday, May 5, 2017, an administrative subpoena was issued to AT&T Internet Services requesting subscriber information for the IP address, 2602:306:c5f1:4560:fd8b:8a3a:99ec:48cc.
11. On Wednesday, June 14, 2017, AT & T Internet Services responded to the administrative subpoena and identified the account holder as Kevin Wilson, having a physical and billing address of 1922 South Moffett, Joplin, Missouri, 64804.
12. On Monday April 2, 2018, I, along with other investigators, executed a search warrant authorized under color of the laws of the State of Missouri at the residence of Kevin and Kaleb WILSON, located at 1922 South Moffett, Joplin, Missouri.
13. Kaleb WILSON was interviewed by myself and FBI TFO Chip Root. Kaleb WILSON admitted that he searched for child pornography on torrent websites such as "4chan." Kaleb WILSON stated that he does not store child pornography due the ease of locating it on the Internet. Kaleb WILSON advised that he views child pornography on his cellular telephone and a computer located in the living room of the residence. Kaleb WILSON stated that he has viewed child pornography since he was approximately 13 years old.
14. At the conclusion of the search of the WILSON residence, several electronic items capable of accessing the Internet and/or storing media content were seized from the home pending

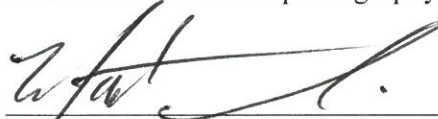
forensic examination. The forensic examination of seized items from the WILSON residence is ongoing.

15. On Tuesday, August 14, 2018, Detective Chadd Nolan, of the Vancouver, Washington Police Department, contacted the Southwest Missouri Cyber Crimes Task Force and requested assistance in his investigation of Kaleb WILSON involving a minor female, hereafter, Jane Doe, residing in his jurisdiction.
16. Detective Nolan initiated his investigation after the mother of a minor female reported that her child had been exchanging sexually explicit messages and imagery with at least one adult male.
17. One of the suspects developed from the follow-up investigation was identified as Kaleb L. WILSON, residing at 1922 South Moffett, Joplin, Missouri. Kaleb WILSON communicated with the minor victim via the social media application "Kik," under the username "CorvetteMan69," and using the SnapChat application under username "kalebw91."
18. Detective Nolan was able to determine that Kaleb WILSON and Jane Doe exchanged communications between December 2016, through August 08, 2018, during the forensic examination of Jane Doe's electronic tablet and cellular telephone.
19. The forensic examination of the devices also revealed that Kaleb WILSON and Jane Doe exchanged pictures with one another. Specifically, Jane Doe sent Kaleb WILSON images depicting her genital area. Kaleb WILSON sent Jane Doe multiple images of his face and a picture of an erect penis.
20. Communications between Jane Doe and Kaleb WILSON indicated that Kaleb WILSON was aware of the fact that Jane Doe was a minor. On August 7, 2018, during a chat thread

with Kaleb WILSON, Jane Doe wrote, "625 days until I can be with you without worrying what could happen." Later, in the same chat conversation, the Jane Doe stated, "Once I get a job I am opening a savings account for once I turn 18 and I an headed straight for you."

CONCLUSION

21. Based upon the above facts, this affiant believes there is probable cause in support of a criminal complaint against Kaleb WILSON for violation Title 18, United States Code, Sections 225(a)(2), that is, receipt and distribution of child pornography.


Matthew Smith
Task Force Officer
HIS

Sworn and subscribed to before me this 11th day of October 2018


DAVID P. RUSH
UNITED STATES MAGISTRATE JUDGE